

# EXHIBIT 10



**Sequoia Union High School District**  
**Uniform Complaint Procedures**  
**COMPLAINT FORM**

**I. Your Contact Information**

Last Name: Lyle First Name: Scott

Address: [REDACTED] Apt. #:       

City: [REDACTED] State: [REDACTED] Zip: [REDACTED]

Home Phone: [REDACTED] Work or Cell Phone:                     

Email: [REDACTED]

**II. Complainant**

You are filing this complaint on behalf of: [REDACTED] Lyle and WHS Jewish community

☒ Parent/Guardian    ☐ Pupil    ☐ Witness to the Incident    ☐ Other:                     

**III. School Information**

School Name: Woodside High School

Grade: 11 Principal: Karen Van Putten

**IV. Basis of the Complaint**

**A. District violation of state or federal law or regulations/policies governing:**

- |   |   |
|---|---|
| <input type="checkbox"/> Accommodations for Pregnant and Parenting Pupils   | <input type="checkbox"/> Every Student Succeeds Act / No Child Left Behind (Titles I–VII)       |
| <input type="checkbox"/> Adult Education  | <input type="checkbox"/> Local Control and Accountability Plans (LCAP)                          |
| <input type="checkbox"/> After School Education and Safety  | <input type="checkbox"/> Migrant Education  |
| <input type="checkbox"/> Agricultural Career Technical Education  | <input type="checkbox"/> Physical Education Instructional Minutes                               |
| <input type="checkbox"/> Career Technical and Technical Education; Career Technical; Technical Training (State)   | <input type="checkbox"/> Pupil Fees   |
| <input type="checkbox"/> Career Technical Education (Federal)   | <input type="checkbox"/> Reasonable Accommodations to a Lactating Pupil                         |
| <input type="checkbox"/> Child Care and Development   | <input type="checkbox"/> Regional Occupational Centers and Programs                             |
| <input type="checkbox"/> Compensatory Education   | <input type="checkbox"/> School Plans For Student Achievement                                   |
| <input type="checkbox"/> Course Periods without Educational Content   | <input type="checkbox"/> School Safety Plans  |
| <input type="checkbox"/> Education Of Pupils In Foster Care, Pupils Who Are Homeless, Former Juvenile Court Pupils Now Enrolled In A School District, and Pupils Of Military Families | <input type="checkbox"/> School Site Councils   |
|   | <input type="checkbox"/> State Preschool  |
|   | <input type="checkbox"/> State Preschool Health And Safety Issues In LEAs Exempt From Licensing |

**B. Unlawful discrimination, including discriminatory harassment, intimidation, or bullying, based on actual or perceived characteristics of the following:**

- |   |  |
|---|--|
| <input type="checkbox"/> Age (age 40+ in employment)            | <input type="checkbox"/> Marital or Parental Status  |
| <input checked="" type="checkbox"/> Ancestry                    | <input checked="" type="checkbox"/> Nationality  |
| <input type="checkbox"/> Breastfeeding Students                 | <input checked="" type="checkbox"/> National Origin  |
| <input type="checkbox"/> Color                                  | <input checked="" type="checkbox"/> Race or Ethnicity                                      |
| <input type="checkbox"/> Physical or Mental Disability          | <input checked="" type="checkbox"/> Religion   |
| <input checked="" type="checkbox"/> Ethnic Group Identification | <input type="checkbox"/> Sex   |
| <input type="checkbox"/> Gender Expression                      | <input type="checkbox"/> Sexual Harassment (Title IX)                                      |
| <input type="checkbox"/> Gender Identity                        | <input type="checkbox"/> Sexual Orientation  |
| <input type="checkbox"/> Gender                                 | <input type="checkbox"/> Association with any of these actual or perceived characteristics |
| <input type="checkbox"/> Genetic Information                    |  |

**C. Allegations of noncompliance of the following:**

- ☐ Student bullying that is not based on the above listed protected classes
- ☐ Retaliation against a complainant or other participant in the complaint process or anyone who has acted to uncover or report a violation subject to the uniform complaint procedures

**D. Expulsion Appeal:**

- ☐ If you are appealing an expulsion, list the date of the District's decision to expel: \_\_\_\_\_  
*(Please attach all District expulsion documentation to your complaint)*

**V. Details of Complaint**

Please answer the following questions to the best of your ability. Attach additional sheets of paper if you need more space.

Please **describe** the type of incident(s) you experienced that led to this complaint, in as much detail as possible, including all dates and times when the incident(s) occurred or when the allege acts first came to your attention and location(s) where the incident(s) occurred:

See Attached

List the **individuals** involved in the incident(s) complained of:

See Attached

List any **witnesses** to the incident(s):

WHS Student Body, Administration, Internet users

**What steps**, if any, have you taken to resolve this issue before filing a complaint?

See attached

I understand that the District will maintain the confidentiality of this information, to the extent provided by law or the applicable collective bargaining agreement; that I will be protected from retaliation for filing this complaint; that the District may request further information about this matter; and if such information is available, I agree to present it upon request.

I understand that with the exception of pupil fee complaints, which may be filed within one (1) year of the alleged violation, all other complaints must be filed within six (6) months of the alleged occurrence. Pupil fees and LCAP complaints may be filed anonymously.

I believe that the forgoing is true and correct.

Note: I understand that if I file a complaint right before Thanksgiving Recess, Winter Recess, Spring Recess or Summer Recess, that school staff will be on vacation and it will take longer to investigate; and I agree to extend the timeline for responding to my complaint by the number of days schools are closed. Initials \_\_\_\_\_

  
Signature of Person Filing Complaint

4-22-2024  
Date

Please submit this complaint to:

Assistant Superintendent of Human Resources  
Human Resources Department  
480 James Avenue  
Redwood City, CA 94062

April 22, 2024

To: [REDACTED]

Cc: [REDACTED]

Re: Uniform Complaint on Discrimination and Harassment

Dear Interim Superintendent Leach and Assistant Superintendent Beal,

We have attempted to resolve serious issues of discrimination and harassment at Woodside High School (WHS) by providing Karen Van Putten involving discriminatory behavior by employees and students. All our efforts to resolve this at the site level have been unsuccessful and the hostile school environment has continued. We are now filing a formal complaint with the district per Board Policy and Administration Regulation 1312.1 - Complaints Concerning District Employees. Additionally, we request that all of our previous discrimination complaints we filed directly with Ms. Van Putten regarding misconduct of WHS teachers and students be investigated by the district. More specifically, we request that, in addition to addressing the recent video incident, the continuing swastika vandalism be finally addressed as antisemitic and hate speech.

We believe Woodside High School has violated the following policies:

- Discrimination Prohibited - No person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.
- Sequoia District Nondiscrimination Policy - The Board of Trustees of the Sequoia Union High School District is opposed to segregation in the public schools in any form, be it racial, socio-economic, political, religious, or based on sex, and will take such practical steps as appear feasible to provide all students with a broad exposure to all facets of a democratic society during their period of school attendance and to ensure equal educational opportunity according to the needs of individual students.
- [Policy 0410: Nondiscrimination In District Programs And Activities](#)
- [Regulation 5145.3: Nondiscrimination/Harassment](#)
- [SUHSD Policy 4119.21](#)
  - a. #2 - Engaging in harassing or discriminatory behavior towards students, parents/guardians, staff, or community members, or failing or refusing to intervene when an act of discrimination, harassment, intimidation, or bullying against a student is observed.

We would like all the complaints investigated by the district and a response within thirty days per your Uniform Complaint Policy:

- The District shall investigate complaints alleging failure to comply with such laws and/or alleging discrimination and shall seek to resolve those complaints in accordance with the district's uniform complaint procedures.

- Within thirty (30) days of receiving the complaint, the compliance officer shall prepare and send to the complainant a written report of the District's investigation and decision, together with corrective actions

We would like to ensure our identities remain confidential and that any type of retaliation will not be tolerated per your Uniform Complaint Policy:

- Complainants are protected from retaliation and the identity of the complainant alleging discrimination shall remain confidential, as appropriate.

### **Complaint Information:**

1. Our Jewish children represent a very small and vulnerable minority at Woodside High School (WHS) which has repeatedly experienced harassment from both students and teachers alike. The pervasive discrimination against Jewish students has created a hostile school environment and the principal has failed to address or prevent further misconduct.
2. Teachers have made offensive, derogatory, and highly unprofessional remarks to our Jewish kids:
  - Pointing out Jewish physical characteristics.
  - Swastika graffiti on school grounds was dismissed by the administration as Buddhist Anime. Then subsequent swastika events have been reported on WHS campus.
  - Teachers have singled out Jewish students in Ethnic Studies, Social Studies, and History classes for debate about Israel.
3. On multiple occasions, Jewish parents and students met with Ms. Karen Van Putten, principal of WHS and the administration - but no corrective actions have been taken to our knowledge. This violates district policy as the principal failed to investigate and implement immediate measures necessary to stop the discrimination and ensure that all students have access to the educational program and a safe school environment.
4. On March 21st, WHS promoted an Arab-Muslim "tolerance" video to the student body that slandered and caused significant anxiety at the expense of our Jewish students:
  - While the narrative discussed islamophobia, it portrayed offensive imagery by of the "Free Palestine" movement, in other words, it attacked Jews and the Jewish State.
  - The "Free Palestine" organization has very dark roots and promotes the genocide of Jews in Israel. Its founder, Yasser Qashlaq, is famous for his antisemitic and genocidal comments about Jews, making many disturbing statements that include:
    - "You will never be able to make peace with us."
    - "There is no reason for coexistence."
    - "Those human pieces of filth."
  - The video contained explicit endorsements from academic authority figures with statements such as, "I'm depending upon the youth to be the leaders of this movement"
  - Letters to Karen Van Putten and the SUHSD Board have yielded no constructive or Productive material responses.
  - In a communication dated April 1, a small group of parents requested the following:
    1. Provide training regarding antisemitism to administrators, teachers, and subsequently, students.
    2. As guardrails, require proper history training by teachers and administrators so future mistakes can be identified before there is a problem. It should be widely understood that:



- a. Jews are an ethnic group indigenous to Israel with a continuous thousand-year history in the land, since 1200 BC, surviving countless occupiers (e.g. Assyrians, Babylonians, etc.).
- b. Under Roman occupation, Romans referred to Jews as Palestinians to strip them of their cultural identity. Arab conquest came 15 centuries later, in the 7th century AD. Under the Ottoman Empire, Jews lived as Dhimmi and paid taxes to live in their own country.
- c. In 1920, In the 1900s, during WWI and WWII the League of Nations, the UN, and the Allied Powers began to decolonize defeated powers utilizing an internationally accepted legal principle called “Uti Possidetis Juris”, which returns colonized territories to their previous “geopolitical boundaries”. In this process, the Ottoman Empire was decolonized into Iraq, Lebanon, Syria, Jordan, and Israel through a series of “mandates”.
- d. Yasser Arafat, founder of the PLO, did not adopt the term “Palestinian” for the Arabs who lived in that region until 1964. Prior to that time, everyone who lived in the region were understood to be either Palestinian Jews or Palestinian Arabs, but Palestinian referred only to the region of Palestine—it was never a sovereign country.
- e. Today, less than half of Israeli Jews are European diaspora Jews and Israeli Arabs have the same rights as Jews. (In 2022, Khaled Kabub became the first Muslim member to be permanently appointed to the Supreme Court of Israel.)

Until we are assured that administrators and teachers understand Jewish history, antisemitism, and how to discuss related topics, we suggest following San Mateo Union High School District’s lead by not allowing discussions about the Israel-Hamas war in the classroom:

1. Provide a tool for students to anonymously report antisemitism (and other hate) incidents and/or curricular violations.
2. Provide education for students and staff about the bounds of free speech in the classroom and the civil rights of individual students in a school setting.
3. Adopt the IHRA’s definition of antisemitism (already adopted by, for example, the US Department of State), without any modifications, and operationalize it in the district using this checklist developed by the by the National Education Association’s Jewish Affairs Caucus.
4. Transparency - We request that teachers make classroom material and assignments available on their online portal for all students and parents in their classes.

A letter was sent on April 3, 2024 to the advisors to the JSU (Jewish Student Union) with specific requests which were forwarded to Karen van Putten; confirmation that the email was forwarded in an email dated April 18th. The requests related to the video were as follows:

1. Every day the video remains live, another student could be influenced. In turn, the video should be taken down, which is still running on YouTube with 700 subscribers. Or, edit the video by stripping out the Free Palestine segments from the video.
2. If we wish to promote acceptance, and discourage hate, can we call out hate when we see it to educate and promote critical thinking? Make a follow-up announcement that the specific images represented a militia group from Syria called “Free Palestine” and share the previously documented comments made by its founder.
3. Encourage critical thinking and discourage emotional narratives and sound bites.
  - Going forward, could we establish guardrails to review “hot topic” content before it is published?

- Could we use this incident to make a public service announcement about Jew hate? We could even create combined Islamophobia/Antisemitism messages if there is concern about appearing biased in any way.
  - Could we invite an Arab Israeli (not a Jewish Israeli or an Arab Palestinian) to speak at the WHS to provide a legitimate and informed perspective on this complex subject?
  - Could we teach the history of Israel and Jews as an ethnic group starting from our first archeological record in 1206 BC? Here is an outline written for your consideration: [REDACTED]
4. There has been no formal restorative response from Karen van Putten or the Board to date since the video was shown. We request immediate action be taken to undo the damage done and prevent further antisemitic events.

We would like to point out that other school districts are seeing the groundswell of antisemitic events and are addressing it. Here are some very recent examples:

- On Thursday, April 4<sup>th</sup> a guest speaker at Wilcox High School in Santa Clara included an Arab Muslim born and raised in Israel, who presented on her personal story to the interested students. It offered an alternative, truthful account of Israel and the Jewish community.
- On Monday, April 15<sup>th</sup>, a Bowditch math teacher in Foster City engaged in a day of silence to express their disagreement with the current war in Gaza. Within a matter of days, the school had investigated, issued a school wide email and they are working to get antisemitism training.
- Chino Valley Unified Board President refuses to allow pro-Hamas supporters to hijack a school board meeting citing no jurisdiction when discussing school business.

These examples show a willingness by the respective school districts to educate the community, condemn racism and refuse to use schools as a platform to disseminate hate propaganda.

The hostile school environment at Woodside High School has caused significant harm to students and families. Ms. Van Putten knew about multiple incidents of discrimination of Jewish students at WHS for months and has failed to take appropriate action to stop the prohibited misconduct. We hope the district completes a thorough investigation and takes immediate action to prevent any further discriminatory misconduct by SUHSD employees and students.

Sincerely,

Scott and Lori Lyle  
Steve & Michele Harkov  
Jennifer and Daniel Reif  
Rachel Freiberg  
Sharone Mendes Nassi  
Vadim Spector  
Marina and Igor Bershteyn  
Larry and Shani Pascal